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Subject: Re: Mann v. Plus One, etc.

From: "Deborah MartinNorcross" <dmnorcross@martinnorcross.com>

Date: Mon, Feb 11, 2008 11:36 am

To: "numoh@umohlaw.com" <numoh@umohlaw.com>

Cc: HDERSCHOWITZ@lskdnnylaw.com

Given the cross-claims, please set this up as a conference call.

On 2/11/08, [numoh@umohlaw.com](mailto:) <numoh@umohlaw.com> wrote:

Deborah: Ok, I will resend them to both offices. Just let me know if you get the documents in the mail today. Did you receive the email with the documents bates stamped 0001-0184?

Harold: can you give me a good time to reach you by telephone. I have left a couple of messages with your office. There are a few things I need to address with you and the telephone will be more convenient.

Thank you

Uwem I. Umoh
255 Livingston Street,
4th Floor
Brooklyn, NY 11217
718.360.0527
718.360.1916 (Fax)

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Subject: Re: Mann v. Plus One, etc.

From: "Deborah MartinNorcross" <dmnorcross@martinnorcross.com>

Date: Mon, Feb 11, 2008 12:44 pm

To: "numoh@umohlaw.com" <numoh@umohlaw.com>

Cc: "Harold Derschowitz (x263)" <HDERSCHOWITZ@lskdnylaw.com>

There are no rules about oral communications among counsel, particularly between co-defendants, nor am I going to create any. Harold now is aware of my request and, I am confident, will do whatever he concludes is in the best interests of his clients.

You did not e-mail any "bates-stamped documents" attachment to our clients' document requests. You did copy me on the e-mailed documents you sent in response to co-defendants' discovery requests. Until I receive what you represent you mailed last Monday, I cannot finalize the "deficiency letter" you have requested. Please keep in mind that a responding party is obligated to serve proper responses to discovery requests in the first instance.

Thank you.

On 2/11/08, numoh@umohlaw.com <numoh@umohlaw.com> wrote:

Despite the cross-claims, at some point Harold must have communicated to you that he did not receive my package that I mailed to him. I was not privy to this call or email. If the defendants do not wish to speak me without all parties on the line and if this is the rule going forward. I also need to know if this applies to communications between all parties.

Deborah, did you receive the bates stamped documents I emailed to you. Also, when can I expect your deficiency letter.

Thank you

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----- Original Message -----

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